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## Attorneys for Defendant Hartford Life and Accident Insurance Company

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

## HADAR MEIRI, an individual,

Plaintiff,

V.

# HARTFORD LIFE AND ACCIDENT INSURANCE COMPANY,

**Defendant.**

Case No. 3:16-cv-00103-JST

**STIPULATION FOR TWO-WEEK  
CONTINUANCE FOR REMAINING  
BRIEFING FOR CROSS - MOTION  
FOR JUDGMENT AND HEARING  
DATE: [PROPOSED] ORDER**

**Complaint Filed: January 7, 2016**

For the reasons set forth below, the parties respectfully request that the Court permit a continuance of the following briefing schedule deadline and corresponding change in the hearing date:

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1 By and through their counsel of record, Plaintiff Hadar Meiri (“Meiri”) and  
 2 Defendant Hartford Life and Accident Insurance Company (“Hartford”), hereby  
 3 stipulate and respectfully request that the Court permit a two-week continuance of  
 4 the remaining briefing schedule deadlines with a corresponding change in the  
 5 hearing date. Good cause exists as follows:

6 Whereas in this ERISA case, the Court set a briefing schedule for the parties’  
 7 respective Cross-motions for Judgment under FRCP Rule 52. (Doc. 19) Plaintiff  
 8 Meiri filed her Motion for Judgment on October 19, 2016. Defendant Hartford  
 9 filed its Motion for Judgment on November 9, 2016.

10 Whereas the parties requested a continuance of the responsive motion  
 11 deadlines and trial due to the medical leave and rehabilitation of Plaintiff’s counsel,  
 12 Rebecca Grey, in late October, as well as limited availability of legal staff and  
 13 conflicts from winter holidays. The Court set the following dates: Plaintiff’s  
 14 responsive brief extended from November 30, 2016 to January 5, 2017;  
 15 Defendant’s responsive brief extended from December 21, 2016 to February 2,  
 16 2017; and the Motion hearing moved from January 12, 2017 to February 16, 2017,  
 17 at 2:00 p.m.

18 Since that time, in late November, Defendant’s counsel, Melissa M. Cowan,  
 19 had a trial set for January 30, 2017, in the United States District Court, Northern  
 20 District of California, in *Arlene Tom v. Hartford Life and Accident Insurance*  
 21 *Company*, Case No. 16-cv-01067. The pre-trial conference in that case is set for  
 22 January 18, 2017, and the district court has already confirmed trial will proceed as  
 23 scheduled. Ms. Cowan is the only attorney handling the *Meiri* case, such that the  
 24 January 30<sup>th</sup> trial will affect her ability to prepare and complete Hartford’s  
 25 responsive brief which is due that same week. Ms. Cowan’s husband is also  
 26 scheduled for surgery on January 25, 2017, and it cannot be moved.

27 Plaintiff filed her responsive brief on January 5, 2017, which included a  
 28 motion to strike a prior declaration filed by Defendant’s counsel. The parties met

1 and conferred and propose the following new schedule to accommodate these  
2 unavoidable issues.

3           • Defendant's opposition to Plaintiff's motion to strike, currently due on  
4           January 19, 2017, shall be extended to February 7, 2017.  
5           • Plaintiff's reply for the motion to strike shall be extended to February 16,  
6           2017  
7           • Defendant's responsive brief for the cross-Motion for Judgment, currently  
8           due on February 2, 2017, shall be extended to February 16, 2017.  
9           • The parties request that the hearing date for both the cross-Motions for  
10          Judgment and the Motion to Strike be moved from February 16, 2017 at  
11          2:00 p.m., to March 9, 2017 at 2:00 p.m. The court's website reflects that  
12          the Court is not available for hearings on March 2.

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IT IS SO STIPULATED

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Dated: January 13, 2017

The Grey Law Firm, P.C.  
Rebecca Grey  
Kate Rozenvasser

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By: /s/ Rebecca Grey [as authorized  
on 1/13/17]

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Rebecca Grey  
Attorneys for Plaintiff Hadar Meiri

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Dated: January 13, 2017

Burke, Williams & Sorensen, LLP  
Melissa M. Cowan  
Keiko J. Kojima

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By: /s/ Melissa M. Cowan

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Melissa M. Cowan  
Attorneys for Defendant Hartford Life  
and Accident Insurance Company

1 PURSUANT TO STIPULATION, IT IS SO ORDERED:  
2  
3 DATED: January 18, 2017

  
4 Honorable Jon S. Tigar  
United States District Court Judge  
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